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executed in New Jersey. The fund was in New York and a New York trust company was named as alternate trustee. The New Jersey settlor died, and the New York settlor filed this bill for a settlement of accounts and a construction of the trust deed. The question arose as to what law governed the disposition of unexpended accumulations. *Held*, that the New York law governed. *Curtis v. Curtis*, 173 N. Y. Supp. 103.

It is well settled that the validity of a testamentary trust of personalty is determined by the law of the testator's domicile at the time of his death. *Whitney v. Dodge*, 105 Cal. 192, 38 Pac. 636; *Canterbury v. Wyburn*, [1895] A. C. 89. *Cf. In re Crum*, 98 Misc. 160, 164 N. Y. Supp. 149. See 19 HARV. L. REV. 457. As to declarations of or transfers on trust *inter vivos*, the law of the *situs* of the *res* would seem to govern its validity, as that law alone can effectively create an interest in the *res*. See *Cammell v. Sewell*, 5 H. & N. 728. *Green v. Van Buskirk*, 5 Wall. (U. S.) 307, 7 Wall. (U. S.) 139. See also 20 HARV. L. REV. 382, 394. Where, however, it is held that the *cestui que trust* acquires but a right *in personam* against the trustee and not rights *in rem*, though the validity of the transfer to the trustee would be determined as above by the law of the *situs*, yet the validity of the trust would be determined by the law of the place of the declaration of or the transfer on trust. See 17 COL. L. REV. 467, 497. In either case the administration of a trust of personalty must be governed by the law of the place where the testator or settlor intended the trust to be administered. *First National Bank v. National Broadway Bank*, 156 N. Y. 459, 51 N. E. 398. See 20 HARV. L. REV. 382, 395. See also 17 HARV. L. REV. 123, 570. As in the principal case it was clear that the settlors intended the trust to be administered in New York, and as the right of the life *cestui que trust* to accumulated income is a question of administration, the court properly applied New York law.

CONSTITUTIONAL LAW — CONSTRUCTION, OPERATION, AND ENFORCEMENT OF CONSTITUTIONS — FEDERAL POWER OVER LANDS OF UNITED STATES WITHIN A STATE. — Section 2296 of the United States Revised Statutes provides: "No lands under the provisions of this Act shall in any event become liable to the satisfaction of any debt or debts contracted prior to the issuing of the patent therefor." The entryman contracted debts, some before the issuing of the final certificate, others after it but before the issuing of the patent. *Held*, that the statutory exemption covers all these debts. *Ruddy v. Rossi*, U. S. Sup. Ct., No. 17, October Term, 1918.

For a discussion of this case, see NOTES, page 721.

CRIMINAL LAW — HOMICIDE — THREATS — THREATS TO TAKE THE LIFE OF THE PRESIDENT. — An act of Congress made it an offense punishable by fine of \$1,000 or imprisonment not exceeding five years, or both, knowingly and wilfully to make a threat against the President. 39 STAT. 919, c. 64. An indictment was brought under this act charging John Stobo with making a threat in the following language: "The President ought to be shot and I would like to be the one to do it." The indictment did not allege that the threat was addressed to any one, or that it was uttered with intent to menace the President, or that any one heard it. *Held*, that the indictment fails. *United States v. Stobo*, 252 Fed. 689 (Dist. Ct., Del.).

For a discussion of threats under this statute, see NOTES, page 724.

EQUITY — EQUITABLE EASEMENTS OR SERVITUDES — INTENTION OF PARTIES. — In developing a tract of land for the sale of building lots, the owner installed a sewage system according to a plan, the system being operated by a pumping plant on the owner's land. By an agreement with the village the owner agreed to run the plant as long as the system should be in use. After a number of